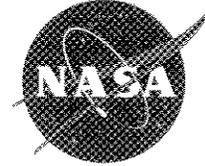


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



February 25, 2009

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

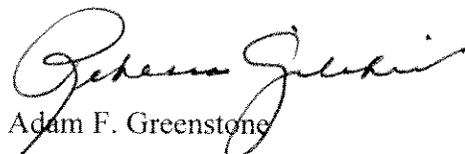
SUBJECT: Determination Regarding Attendance by NASA Employees at the American Institute of Aeronautics and Astronautics (AIAA) Luncheon on March 11, 2009

On March 11, 2009, AIAA, a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host a luncheon at the Renaissance Washington Hotel, in Washington, D. C., from 11:30a.m.-2:00p.m. The guest speakers will include Pierre Chao, Managing Partner and co-founder Analysis, Teal Group Corp., Philip Finnegan, Director, Corporate Analysis, Teal Group Corp., and Richard Aboulafia, Vice President, Analysis, Teal Group Corp., will provide their best insights on the business climate in the aerospace sector and address the prevailing market conditions and the likely future of the aerospace market in these uncertain economic times.

Approximately 400 individuals have been invited. Attendees will include NASA personnel, industry leaders, officials from other Federal agencies, members of Congress and their staffers, academia, and other aerospace associations. The estimated cost of the luncheon, which includes all food and beverages is \$150 per person.

I find that this event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend the event. Accordingly, NASA invitees may attend the event without charge. The luncheon will also give NASA employees the opportunity to discuss and share an interest or vocation in aerospace.

However, NASA employees whose duties may substantially affect the event sponsors or majority of its members such as by way of procurement duties, or who are in non-career positions for which the President's Executive Order of January 21, 2009, requires signing an ethics pledge, should seek an individual determination pursuant to 5 CFR § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.


for Adam F. Greenstone